

The Estate of Chemetco, Inc.
Hartford, Illinois

FUGITIVE EMISSIONS CONTROL PLAN

Dated: November 20, 2008

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EH&S Manager

I. PURPOSE

This Fugitive Emissions Control Plan documents the control of dust on the Chemetco, Inc. (Chemetco) Facility as required as required in paragraph 17 of the September 16, 2008 Interim Order in the Matter of the United States and the People of the State of Illinois v. Chemetco, Inc., Civil Case Nos. 00-670-DRH and 00-677-DRH (consolidated).

Additionally, the Facility currently operates under an Administrative Seal Order (Seal Order) issued on December 4, 2001 by the Director, Illinois Environmental Protection Agency (IEPA), presented as Attachment B1. Paragraph 6. of Attachment A to the Seal Order states that “ Movement of scrap or other materials and vehicular traffic must be conducted in a manner that will minimize the release of particulate fugitive emissions to the atmosphere. A Fugitive Emissions Control Plan, that will achieve a level of 95% percent control, must be submitted and approved by the Illinois Environmental Protection Agency prior to removal of materials from Chemetco.”

Due to the anticipated future increase in activity on the Facility as follows, fugitive emissions control of dust and particulates of the Facility is of concern to protect personnel, property and prevent the release of materials of environmental concern to the environment:

1. Loading and shipments of sales materials (Cupro, Pot Slag, and Copper Furnace Cleanup Solids) from stockpiles in the Foundry Building are scheduled to begin in early December, 2008 under approved Work Plans under the Interim Order;
2. RCRA Closures of the AAF Decontamination Area and Sump and Brick Shop Container Storage Area, work is expected to commence in early December, 2008 and be completed and closed by January 31, 2009; and

3. By early December, 2008, the Estate expects to execute an agreement with Metallo Chimique NA to finance the removal and sale of the three furnaces in the Foundry Building. Work is not expected to start until late 1st Quarter 2009 after submission and approval of a Work Plan.

II. BACKGROUND

The Chemetco Facility is contaminated with the dust from slags (produced as a by-product of the secondary copper smelter that operated on the site from 1970 until shutdown in 2001) and scrubber sludge/zinc oxide (emissions particulates from the smelting operation). Slag and scrubber sludge both exhibit toxic characteristics for lead and cadmium as well as low levels of nickel, tin, and other metals of concern.

Future activities on the site, as described in Section I. PURPOSE, are of concern to generate fugitive emissions as work impacts these materials.

III. FUGITIVE EMISSIONS CONTROL

The following control measures are to be incorporated into work plans and normal activities to control fugitive emissions within 95% of control (visual sign of particulates above that created by nature):

1. Reduce activity so that there is no visible sign of particulates,
2. Use water spray or mist to control emissions but be careful not to cause runoff,
3. Use coating/bonding agent (e.g., cohex) to coat particulates, and/or
4. Remove source of particulates (e.g., vacuum up particulates and containerize).

IV. RESPONSIBILITIES

Management of Facility – Laura K. Grandy, Trustee

Facility Maintenance – Eric Watt and George Boud

EH&S – Gary Davis

ATTACHMENT B1
IEPA SEAL ORDER